## **REMARKS**

Claims 1, 2, 5-13, 16-24, 42-45 and 48-52 are all the claims pending in the application.

## I. Claim Rejections under 35 U.S.C. 112, first paragraph

On page 3 of the Office Action, the Examiner has indicated that claims 1, 6, 9, 42 and 52 do not comply with the written description requirement. It is noted, however, that the Examiner has not provided any reasons as to why it is believed that the above-noted claims do not satisfy the written description requirement, nor has the Examiner pointed to any claim language in the above-noted claims which allegedly fails to comply with the written description requirement.

Applicants respectfully submit that claims 1, 6, 9, 42 and 52 comply with the written description requirement of 35 U.S.C. § 112, first paragraph, and therefore, respectfully request that the rejection be reconsidered and withdrawn.

If the Examiner maintains the rejection, Applicants request that the Examiner point out the specific features of claims 1, 6, 9, 42 and 52 which allegedly do not comply with the written description requirement, and provide specific reasons as to why it is believed that such features do not comply with the written description requirement.

## II. Claim Rejections under 35 U.S.C. § 102

The Examiner has rejected claims 1, 2, 5-13, 16-24, 42-45 and 48-52 under 35 U.S.C. § 102(e) as being anticipated by Aburakawa et al. (U.S. 2003/0007214).

Claim 1, as amended, recites the features of a plurality of <u>sub-stations</u> for forming respective wireless communication areas individually in the local area, and performing wireless communication with the wireless communication terminals in the respective corresponding wireless communication areas; a <u>main station</u> connected to each of the plurality of sub-stations via an optical fiber transmission path; and plurality of <u>access points</u>, connected to the main station via a wireless transmission path, for converting signals to be input from an outside of the local area to an inside of the local area to a signal form for use in the local area, and converting signals to be output from the inside of the local area to the outside of the local area to a signal form for use in the outside of the local area.

Regarding the above-noted features, the Examiner has taken the position in the Office Action that the base stations (BS1-BS7) of Aburakawa correspond to the "sub-stations" of claim 1, that the control station (40, 60) of Aburakawa corresponds to the "main station" of claim 1, and that the access radio transceivers (52, 72) of Aburakawa, correspond to the "access points" of claim 1. Applicants respectfully disagree with the Examiner's position.

In particular, Applicants note that in Aburakawa, the access radio transceivers (52, 72) form a part of the base stations (BS1-BS7), and as such, Applicants submit that the access radio transceivers (52,72) of Aburakawa cannot correspond to the "access points" of claim 1 because the "sub-stations" and "access points" of claim 1 are clearly claimed as separate elements.

Further, as noted above, claim 1 has been amended to recite that the access points are connected to the main station via a wireless transmission path. As clearly shown in Figs. 3 and 5 of Aburakawa, the access radio transceivers (52, 72), which the Examiner has indicated corresponds to the "access points" of claim 1, are clearly connected to the control station (40, 60) via an optical fiber, not via a wireless transmission path.

In view of the foregoing, Applicants respectfully submit that Aburakwa does not disclose, suggest or otherwise render obvious the combination of "sub-stations", "main station" and "access points" as set forth in amended claim 1. Accordingly, Applicants submit that claim 1 is patentable over Aburakawa, an indication of which is kindly requested.

Moreover, Applicants note that claim 1 also recites the feature of a main station comprising a managing section operable to determine one of a plurality of access points to which a first one of the wireless communication terminals is accessible; and a selecting section operable to select and output one of the signals to be input from the outside of the local area, whose form is converted in the one of the plurality of access points determined by the managing section, and which is input to the local area, to the first wireless communication terminal via a corresponding one of the sub-stations.

Regarding this feature, as noted above, the Examiner has taken the position that the control station (40, 60) of Aburakawa corresponds to the "main station" of claim 1.

With respect to the control stations (40, 60) of Aburakawa, however, Applicants respectfully submit that while the control station 40 is able to communicate with a

communication terminal (e.g., MS1) when the communication terminal moves to a new base station without undergoing any switching operation (see paragraph [0055]), and the control station 60 is able to communicate with a communication terminal (e.g., MS1) when the communication terminal moves to a new base station by controlling the wavelength of the variable-wavelength light source 64 (see paragraph [0065]), that neither the control station 40 nor the control station 60 has the ability to determine one of a plurality of access points to which a first one of the communication terminals is accessible.

Thus, as Aburakawa does not disclose the ability to determine one of a plurality of access points to which a communication terminal is accessible, Applicants respectfully submit that Aburakawa does not disclose, suggest or otherwise the above-noted feature drawn to the main station comprising a managing section operable to determine one of a plurality of access points to which a first one of the wireless communication terminals is accessible; and a selecting section operable to select and output one of the signals to be input from the outside of the local area, whose form is converted in the one of the plurality of access points determined by the managing section, and which is input to the local area, to the first wireless communication terminal via a corresponding one of the sub-stations, as recited in amended claim 1.

In view of the foregoing, Applicants submit that claim 1 is patentable over Aburakawa, an indication of which is kindly requested.

Claims 2, 5-13 and 16-23 depend from claim 1 and are therefore considered patentable at least by virtue of their dependency.

Regarding claim 24, Applicants note that this claim is drawn to a system for enabling a plurality of wireless communication terminals present in a local area to communicate with a network outside the local area, the system comprising: a plurality of <u>sub-stations</u> for forming respective wireless communication areas individually in the local area, and performing wireless communication with the wireless communication terminals in the respective corresponding wireless communication areas; a <u>main station</u> connected to each of the plurality of sub-stations via a wireless transmission path; and plurality of <u>access points</u>, <u>connected to the main station via a wireless transmission path</u>, for converting signals to be input from an outside of the local area to an inside of the local area to a signal form for use in the local area, and converting signals to

be output from the inside of the local area to the outside of the local area to a signal form for use in the outside of the local area.

For at least similar reasons as discussed above with respect to claim 1, Applicants submit that Aburakawa does not disclose, suggest or otherwise render obvious such features.

Further, Applicants note that claim 24 also recites that the main station comprises a multiplexing section operable to frequency-multiplex the signals converted by the plurality of access points to be input to the local area, and a selecting section operable to select and output the signals to be input to the local area, which have been multiplexed by the multiplexing section, to all of the sub-stations.

As noted above, the control station 40 of Aburakawa is able to communicate with a communication terminal (e.g., MS1) when the communication terminal moves to a new base station without undergoing any switching operation (see paragraph [0055]), and the control station 60 is able to communicate with a communication terminal (e.g., MS1) when the communication terminal moves to a new base station by controlling the wavelength of the variable-wavelength light source 64 (see paragraph [0065]). Applicants respectfully submit, however, that neither the control station 40 nor the control station 60 frequency-multiplexes signals converted by a plurality of access points to be input to the local area, and selects and outputs the signals to be input to the local area, which have been multiplexed by the multiplexing section, to all of the sub-stations, as recited in claim 24.

Regarding claim 42, Applicants note that this claim is drawn to a main station, connected to a plurality of sub-stations via an optical fiber transmission path for forming respective wireless communication areas in a local area and performing wireless communication with a plurality of wireless communication terminals in the respective wireless communication areas, and a plurality of access points for outputting signals to be input from an outside of the local area to an inside of the local area, the main station comprising a managing section operable to determine one of the plurality of access points to which a first one of the wireless communication terminals is accessible, and a selecting section operable to select and output the signals to be input to the local area which have been received by the access points.

For at least similar reasons as discussed above with respect to claim 1, Applicants submit that Aburakawa does not disclose, suggest or otherwise render obvious such a combination of features. Accordingly, Applicants submit that claim 42 is patentable over Aburakawa, an indication of which is kindly requested.

Regarding claim 43, Applicants note that this claim is drawn to a main station, connected to a plurality of sub-stations via an optical fiber transmission path for forming respective wireless communication areas in a local area and performing wireless communication with a plurality of wireless communication terminals in the respective wireless communication areas, and a plurality of access points for outputting signals to be input from an outside of the local area to an inside of the local area, the main station comprising a signal receiving section operable to receive the signals to be input to the local area which have been received by the access points; a multiplexing section operable to frequency-multiplex the signals to be input to the local area, the signals being received by the signal receiving section; and a selecting section operable to select and output the signals to be input to the local area which have been multiplexed by the multiplexing section, to all of the sub-stations.

For at least similar reasons as discussed above with respect to claim 24, Applicants submit that Aburakawa does not disclose, suggest or otherwise render obvious such a combination of features. Accordingly, Applicants submit that claim 43 is patentable over Aburakawa, an indication of which is kindly requested.

Regarding claim 44, Applicants note that this claim is drawn to a sub-station for use in a wireless communication system, wherein the sub-station forms a wireless communication area in a local area, and communicates with a wireless communication terminal present in the wireless communication area formed by the sub-station, wherein in the wireless communication system, signals to be input from an outside of the local area to an inside of the local area are converted by a plurality of access relay apparatuses to a signal form for use in the local area, and one of the signals is selected and output to the sub-station.

As discussed above, Aburakawa discloses a control station (40 or 60), a plurality of base stations BS, and a plurality of communication terminals MS. For at least similar as discussed above with respect to claim 1, Applicants respectfully submit that Aburakawa does not disclose

or suggest the features of a sub-station that forms a wireless communication area in a local area, and communicates with a wireless communication terminal present in the wireless communication area formed by the sub-station, wherein in the wireless communication system, signals to be input from an outside of the local area to an inside of the local area are converted by a plurality of access relay apparatuses to a signal form for use in the local area, and one of the signals is selected and output to the sub-station.

Accordingly, Applicants submit that claim 44 is patentable over Aburakawa, an indication of which is kindly requested. Claims 45 and 48-50 depend from claim 44 and are therefore considered patentable at least by virtue of their dependency.

Regarding claim 51, Applicants note that this claim recites that in a system comprising a plurality of sub-stations for forming respective wireless communication areas individually in the local area, and performing wireless communication with a plurality of wireless communication terminals in the respective corresponding wireless communication areas, a plurality of access points for converting signals to be input from an outside of the local area to an inside of the local area to a signal form for use in the local area, and converting signals to be output from the inside of the local area to the outside of the local area to a signal form for use in the outside of the local area, and a main station provided between the sub-stations and the access points, a method performed by the main station comprises determining one of the plurality of access points to which a first one of the wireless communication terminals is accessible; and selecting and outputting one of the signals to be input from the outside of the local area, whose form is converted in the one of the plurality of access points having been determined, and which is input to the local area, to the first wireless communication terminal via a corresponding one of the sub-stations.

For at least similar reasons as discussed above with respect to claim 1, Applicants submit that Aburakawa does not disclose, suggest or otherwise render obvious such a combination of features. Accordingly, Applicants submit that claim 51 is patentable over Aburakawa, an indication of which is kindly requested.

Regarding claim 52, Applicants note that this claim recites that in a system comprising a plurality of sub-stations for forming respective wireless communication areas individually in the

local area, and performing wireless communication with a plurality of wireless communication terminals in the respective corresponding wireless communication areas, a plurality of access points for converting signals to be input from an outside of the local area to an inside of the local area to a signal form for use in the local area, and converting signals to be output from the inside of the local area to the outside of the local area to a signal form for use in the outside of the local area, and a main station provided between the sub-stations and the access points, a method performed by the main station comprises frequency-multiplexing the signals converted by the plurality of access points to be input to the local area, and selecting and outputting the signals to be input to the local area which have been multiplexed by the multiplexing section, to all of the sub-stations.

For at least similar reasons as discussed above with respect to claim 24, Applicants submit that Aburakawa does not disclose, suggest or otherwise render obvious such a combination of features. Accordingly, Applicants submit that claim 52 is patentable over Aburakawa, an indication of which is kindly requested.

## III. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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